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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MYRA B. MINKS, TIFFANY T. CONLEY,
LETITIA R. MAYS, and ANDREA C.
MOHR,

Defendants.

CR-12-0459 EMC

STIPULATION AND [PROPOSED]
ORDER (1) CONTINUING STATUS
CONFERENCE; AND (2) EXCLUDING
TIME UNDER THE SPEEDY TRIAL ACT

WHEREAS, the above-captioned matter came before the Court on August 29, 2012, for status conference. The United States was represented by AUSA Tom Stevens. Defendant Minks was represented by Gail Shifman, defendant Conley was represented by Tim Crudo, defendant Mays was represented by Ms. Shifman, specially appearing for Mays' counsel, Brian Berson, and defendant Mohr was represented by Brendan Conroy. The Court set the case for a further status conference on November 7, 2012.

STIP. AND [PROPOSED] ORDER RE: STATUS CONF. & STA
CR-12-0459 EMC

1 WHEREAS, on August 30, 2012, this Court entered an order excluding time under the
2 Speedy Trial Act (18 U.S.C. § 3161) through and including November 7, 2012, for effective
3 preparation of counsel.

4 WHEREAS, between August 29 and the date of this filing, the government has made two
5 supplemental productions of discovery material involving over 1,0000 additional pages and/or
6 images, in addition to other electronic-based discovery.

7 NOW THEREFOR, based upon the supplemental discovery produced by the government to
8 the defendants, and in order that counsel for the government may continue to discuss these and other
9 matters with defense counsel, the parties seek (1) to continue the status conference from November
10 7, 2012, to November 28, 2012; and (2) an exclusion of time under the Speedy Trial Act, through
11 and including November 28, 2012, for effective preparation of counsel.

12 SO STIPULATED.

13 DATED: October 30, 2012

MELINDA HAAG
United States Attorney

14
15 _____/s
16 Thomas E. Stevens
Assistant United States Attorney

17 DATED: October 30, 2012

18 _____/s
19 Gail Shifman
Counsel to Myra Minks

20 DATED: October 30, 2012

21 _____/s
22 Timothy Crudo
Counsel to Tiffany Conley

23 DATED: October 29, 2012

24 _____/s
25 Brian Berson
Counsel to Letitia Mays

26 DATED: October 29, 2012

27 _____/s
28 Brendan Conroy
Counsel to Andrea Mohr

[PROPOSED] ORDER

Based upon the above stipulation, the Court orders as follows:

1. The status conference is continued from November 7, 2012, to November 28, 2012, at 2:30 p.m.

2. The Court finds that the time from and including the date of this order, through and including November 28, 2012, should be excluded under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), because the ends of justice served by the continuance outweigh the best interest of the public and defendants in a speedy trial. The findings are based upon the need for the defendants and the government to have reasonable time necessary for effective preparation pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv), taking into account the exercise of due diligence.

IT IS SO ORDERED.

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DATED: October __, 2012

